

REMARKS

Claims 1, 2, 5 and 9 are all the claims pending in the application.

Applicant amends claim 1 even further to clarify the recitation of establishing private mode as an operation mode. This clarification does not narrow the scope of equivalencies encompassed by claim 1. Since this is merely a clarifying amendment, no estoppel is created.

The Examiner rejects:

- claim 1 under 35 U.S.C. § 103(a) as being unpatentable over Applicant's Admitted Prior Art (AAPA) in view of Isley, Jr. et al. (Isley) and IBM Technical Disclosure Bulletin (IBM_TDB); and
- claims 2, 5 and 9 under 35 U.S.C. § 130(a) as being unpatentable over (AAPA) in view of Isley and IBM_TDB, and further in view of Thorne, III et al. (Thorne).

Applicant respectfully traverses these rejections as follows.

Applicant's invention provides a unique combination of method steps for managing a connection of a plurality of devices connected to a digital interface, including, *inter alia*:

- (a) establishing the private mode as an operation mode in a first arbitrary device for a digital connection between the first arbitrary device and a second arbitrary device;
- (b) the first device identifying devices having a right to access related registers to store in itself information relating to the identified devices;
- (c) the first device determining whether there is a request for access to the related registers by a third-party device;
- (d) determining whether the third-party device is included in the previously stored devices if there is a request;
- (e) the first device accepting the request of the third-party device if the third-party device is determined to be included in the devices stored in the step (d); and

(f) the first device returning an error code to the third-party device, which indicates that the first device cannot accept the request, if the third-party device is not determined to be included in the devices stored in the step (d).

(See Applicant's independent claim 1.)

The Examiner acknowledges that AAPA and Isley do not teach performing an operation which selectively controls an external device when operating in private mode. That is, as explained in Applicant's Amendment filed June 16, 2003, AAPA describes a conventional method for managing a digital interface connection where a third-party device can arbitrarily access the existing connection. On the other hand, while Isley proposes to create a net where only the two users tuned to the same channel are able to communicate with one another, nowhere does Isley disclose or suggest how to prevent a third user from arbitrarily accessing such a net, so that the privacy of the two users tuned to the same channel can be protected.

The Examiner relies on IBM_TDB to supply this acknowledged deficiency of AAPA and Isley. In fact, nowhere does IBM_TDB disclose or suggest how to implement its conventional user/host logon procedure to establishing private mode as an operation mode in a first arbitrary device for a digital connection between the first arbitrary device and a second arbitrary device, determining whether a third-party device is included in the previously stored devices [i.e., devices having a right to access related registers], the first device accepting the request of the third-party device if the third-party device is determined to be included in the stored devices, and the first device returning an error code to the third-party device, which indicates that the first device cannot accept the request, if the third-party device is not determined to be included in the stored devices, as required by Applicant's independent claim 1.

Applicant notes that contrary to the Examiner's analysis, the actual disclosures of AAPA, Isley and IBM_TDM, when examined in its entirety, do not provide any motivation, or suggestion as to how, to modify a first/second device connection of AAPA and/or Isley to include a conventional user/host login procedure of IBM_TDM, to prevent unauthorized access to an established first/second connection by a third user. That is, the actual disclosure of these references would lead to nothing more than implementation of a conventional IBM_TDM login procedure to establish a connection between a first device (user) and a second device (host) of AAPA and/or Isley. No provision for handling a request from a third device attempting to enter into the established first/second device connection is either taught or suggested by the AAPA, Isley and IBM_TDM combination. Therefore, in combining these references to arrive at Applicant's claimed invention, the Examiner is engaging in impermissible hindsight by relying on Applicant's own disclosure.

Finally, Thorne does not in any way supply the above-noted deficiencies of AAPA, Isley and IBM_TDM, and as acknowledged by the Examiner is relied on simply to supply the alleged teaching of a method for selective display of information.

Therefore, Applicant's independent claim 1, as well as its dependent claims 2, 5 and 9 (which incorporate all the novel and unobvious features of their base claim), would not have been obvious from any reasonable combination of AAPA, Isley, IBM_TDM and Thorne, at least for the reasons set forth above.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the

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Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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